

DENNIS K. BAHAM
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PLAINTIFF IN PRO PER

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DENNIS BAHAM, an individual

Plaintiff,

vs

ELENA LEE GRAHAM, an official
KRISTIN SCHULMER-HINTZ, an
individual; NATALIE WINSLOW, an
individual, MCCATHY & HOLTHUS, LLP
AKERMAN, LLP; NEW REZ LLC d/b/a
SHELLPOINT MORTGAGE SERVICING;
DOES I through X and ROE
CORPORATIONS I through X, inclusive

Defendants,

Case No.: 2:23-cv-00822-ART-BNW

**MOTION FOR TIME EXTENSION TO
FILE OPPOSITION**

COMES NOW, Plaintiff, Dennis Baham, Pro per, submits this Motion for a Time Extension to file Opposition to Defendant's Joint Motion To Stay Discovery Pending Ruling on Motion To Dismiss. Pursuant to Federal Rules of Civil Procedure 6(b)(1), Plaintiff respectfully moves this court for an extension of 7 days until November 14, 2023 to file his Opposition.

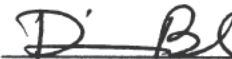
Plaintiff respectfully submits that good cause exists to extend until November 14, 2023. See Fed. R. Civ P. 6(b)(1) (the court may for good cause grant requests for time extension made before the original time expires). As the court knows, plaintiff has been searching for legal counsel. Plaintiff has found possible representation, but due to a hearing was not able to meet with plaintiff

today. (see exhibit 1). The requested extension will provide sufficient time for Plaintiff to meet with counsel to review his case and the Opposition Plaintiff was planning to file. The modest extension requested will not burden or prejudice Defendants.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this motion.

DATED: November 7, 2023

Respectfully submitted,



Dennis Baham Pro per
6017 Guild CT
Las Vegas, NV 89131

CERTIFICATE OF SERVICE

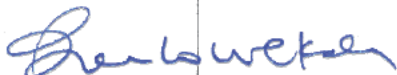
I CERTIFY that on November 7, 2023, I served the **MOTION FOR TIME EXTENSION TO FILE OPPOSITION** by depositing a copy in the united States mail, postage prepaid, to the addresses listed below:

Nicholas E. Belay
Akerman LLP
1635 village center Circle, Suite 200
Las Vegas, Nevada 89134

Good cause being found and pursuant to Rule 6, the Court grants Plaintiff's motion to extend time to file an opposition to Defendant's Motion to Stay Discovery. Plaintiff's opposition shall be filed no later than November 14, 2023.

IT IS SO ORDERED

DATED: 1:45 pm, November 09, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1



dennis bahm <greenskies87@gmail.com>

NV MLD Findings Letter

[REDACTED] Law Office [REDACTED]

Tue, Nov 7, 2023 at 1:17 PM

To: dennis bahm <greenskies87@gmail.com>

Mr. Bahm,

Counsel is still on a hearing and is working on settling a case. She cannot confirm if she will be available to assist you today but if you would to reschedule for tomorrow morning at 9, 10, or 11, we can tentatively schedule it for you, with the hope that this matter gets resolved today.

Let me know how would you like to proceed.

[Quoted text hidden]

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[REDACTED]

[REDACTED]

[REDACTED] Law Group /

[REDACTED]

[REDACTED]